

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION**

DAVID STEBBINS, )  
                        )  
                        )  
Plaintiff,         )  
                        )  
                        )  
v.                     )Case No. 10-3305-CV-S-RED  
                        )  
                        )  
RELIABLE HEAT & AIR, LLC, et al., )  
And                     )  
                        )  
RANDALL RICHARDSON, et al.         )  
                        )  
Defendants.         )

**DEFENDANTS' RESPONSE TO PLAINTIFF'S  
THIRD REQUEST FOR PRODUCTION**

COME NOW, Defendants Reliable Heat & Air, LLC and Randall Richardson, and respond to Plaintiff's Request for Production, as follows:

1. In his answer to his first interrogatory, Richardson explained that he attempted to accommodate my disability by offering me a job reassignment to a computer station.

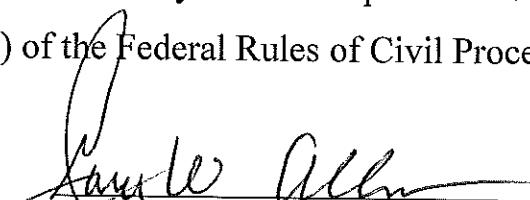
To prove that such a position even *existed*, at the time I worked there, I would like copies of the W-4's of all the workers who worked in that computer position during the year of 2009.

Furthermore, I want a copy of Reliable Heat & Air, LLC's bank records, detailing every single bank transaction from the date of January 1, 2009 to December 31, 2009. Along with the actual bank transactions, I also want the names of the other parties to whom these payments were either sent, or received.

**Response:** Defendants object to this Request for Production. Defendants have previously responded to Plaintiff's Third Request for Production.

Defendants further object to this Request for the following reasons:

1. Object to production because such documents are proprietary information which party never discloses to others. Such information is not relevant to any issue in the litigation between the parties, thus this request is overbroad and is not likely to lead to the discovery of relevant evidence.
2. Object to production for the reason that it requests documents which are irrelevant to the subject matter of this action and which are unlikely to lead to the discovery of admissible evidence.
3. Object to this request as impermissibly and overly broad and vague and not reasonably calculated to lead to the discovery of admissible evidence and on the grounds that it is beyond the scope of discovery permissible under Rule 26(b) of the Federal Rules of Civil Procedure.



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